

COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

Petition of Bay State Gas Company

D.T.E. 05-27

**FOURTH SET OF INFORMATION REQUESTS OF THE
MASSACHUSETTS OILHEAT COUNCIL, INC.**

- MOC-4-1: At pages 55-56 of his testimony (BSG/SHB-1), Mr. Bryant states that the Company's EP&S division provides five separate services identified as (1) the Guardian Care Service Business; (2) the Water Heater Rental Business; (3) the Boiler and Service Sales and Installation Business; (4) Annual Inspections; and (5) Fee for Service. With regard to these services:
- (a) please give the Company's reason(s) for including certain services above the line and others below the line; and
 - (b) please indicate whether EP&S personnel are dedicated exclusively to one of the five businesses or if personnel perform work on each of the five businesses. If personnel work for more than one of the service offerings, explain how the Company allocates the cost of the EP&S management and employees between services that are above the line and services provided below the line.
- MOC-4-2: At page 58 of his testimony (BSG/SHB-1), Mr. Bryant gives the total test year expenses and revenues for the EP&S division service businesses. Please provide a breakout of the expenses and revenues for each of the five EP&S service businesses.
- MOC-4-3: Please indicate whether the EP&S division performs services for customers who are not utility customers of Bay State. If so, please identify the number of non-Bay State customers by type of service offered for each year beginning with 2002 to 2005 (to date).

MOC-4-4: Mr. Bryant states in his testimony that the EP&S' "heating system installation jobs in its distribution system is only 4% of the total market for this activity". With regard to this statement, provide the following information:

- (a) please indicate whether the 4% figure applies solely to the Boiler and Service Sales Installation Business. If so, please indicate whether this figure represents the total sales and service activity of the Boiler and Service Sales Installation Business within the Company's service territories.
- (b) please provide the percentage of the total market activity within the Company's service territories for conversion jobs. Also provide the percentage for work performed outside the Company's service territories, if any; and
- (c) please provide the percentage of total market activity for the EP&S Guardian Care Service, Water Heater Rental, Annual Inspection and Fee for Service Businesses, within the Company's service territories and beyond the Company's service territories if applicable.

MOC-4-5: With regard to the five separate services offered by the Company's EP&S division, please provide the following information:

- (a) copies of applicable tariffs;
- (b) for the years 2002 to 2005 (to date) the number of customers for each service;
- (c) for the years 2002 to 2005 (to date) the number of customer complaints received concerning each service. Please describe the notice of each complaint and the ultimate resolution;
- (d) for the years 2002 to 2005 (to date) the number of contractor complaints received concerning each service. Please describe the nature of each complaint and the ultimate resolution.

MOC-4-6: Please verify that the Company's website is located at www.baystategas.com and provide the following information:

- (a) please identify who designs, maintains and updates the Company's website;
- (b) please give the annual costs relating to website design, management and upkeep for years 2002 to 2005 (to date); and

- (c) please indicate whether the Company splits website costs with any affiliate company and the amounts, if any.

MOC-4-7: On the Company's website at www.baystategas.com/forhome/contractors.htm under the title "Participating Contractors", there is a list of independent contractors who have met two conditions to be listed on the page (they must return customer calls within two days and must provide an estimate within seven days). With regard to this list:

- (a) please identify any other conditions that a contractor must satisfy to earn a listing on the page and provide agreements and/or other relevant documentation; and
- (b) how does the Company monitor the services performed by the listed contractors? For the years 2002 to 2005 (to date), indicate whether any contractor has been dropped from the list or from the program(s)? If so, please describe the reasons and circumstances for removal.

MOC-4-8: Among the terms and conditions of the Guardian Care Repair Service Plan is the statement "At its discretion, Bay State may use qualified contractors to fulfill all or any part of its obligations under the terms and conditions of this agreement." (See Exh. BSG/JES-5, page 18 of 24). With regard to this statement, provide the following information:

- (a) for 2002 to 2005 (to date), please identify how many times the Company has used independent contractors to perform Guardian Care Services for customers and the costs associated with retaining such contractors;
- (b) please indicate whether the contractors listed on the Company's website at www.baystategas.com/forhome/contractors.htm are the only contractors utilized by the Company to perform Guardian Care Services. If not, describe how contractors are selected to perform Guardian Care Services; and
- (c) please identify the reasons the Company would exercise its discretion to utilize an independent contractor to fulfill its Guardian Care Service obligations.

Dated: June 21, 2005

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the Fourth Set of Information Requests of the Massachusetts Oilheat Council, Inc. upon each person designated by the Secretary as a member of the official service list by either hand delivery, mail and/or e-mail.

Dated at Albany this 21st day of June, 2005.

Emilio Petroccione
Roland, Fogel, Koblenz &
Petroccione, LLP
*Attorneys for the Massachusetts
Oilheat Council, Inc.*
1 Columbia Place
Albany, NY 12207
(518) 434-8112